

## SCHEDULE A

### Plaintiff List

Plaintiff Name	Citizenship	Residency	Injury Type
Adrian	U.S.A	New York	Financial harm including investment in the t-shirt business, uncompensated labor including facilitating intensives, coaching students, administrative work and recruiting new students for NXIVM without compensation in reliance on the promise that if he met the hours per week and recruiting requirements he would earn the equivalent of a salary from commissions and income from companies under the NXIVM umbrella, and for the video and editing work for Moving Pixels, and lost education and employment opportunities because Raniere directed him to drop out of school and work for NXIVM entities. Emotional injuries resulting from deportation threats.
Akka, Philip	U.S.A.	New York	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups, and travel and boarding expenses for courses and programs.
Ames, Anthony	U.S.A	Georgia	Financial harm including, by paying tuition and membership fees for NXIVM courses and training; uncompensated labor, including facilitating intensives, coaching students, administrative work and recruiting new students for NXIVM without compensation in reliance on the promise that if he met the hours per week and recruiting requirements, he would earn the equivalent of a salary from commissions and income from companies under the NXIVM umbrella; and lost employment opportunities.
Balassa, Alejandro	Chilean	Mexico	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups, EMs, and

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			travel and boarding expenses for courses and programs, and uncompensated labor including coaching intensives, coaching students and attending meetings, operating cameras and editing film.
Black, Christopher	Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups and EMs, and uncompensated labor including coaching intensives, coaching students and attending meetings.
Brunelle, Deanne	Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups.
Camila	Mexico	Mexico	Physical harm including injuries caused by sexual activity with Raniere and being branded. Financial harm including, uncompensated labor including providing childcare and sexual labor, and lost education and employment opportunities because Raniere directed her to drop out of school and work for RCG; and lost opportunities because she was falsely promised gainful employment in RCG in Mexico and then forced to go into hiding for fear of being prosecuted in the U.S. Emotional harm including, psychological injuries from being raped when she was a minor and when she was an adult, incidental to the pornographic photos of her taken by Raniere when she was a minor, trauma associated with the possible public dissemination of collateral, being isolated and shunned by her family, being threatened with deportation and criminal prosecution, and being branded.
Diaz Cano, Karla	U.S.A.	Maryland	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups, EMs, and travel and boarding expenses for courses and programs, and uncompensated labor

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			including coaching intensives, coaching students and attending meetings.
Carrier, Madeline	Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups.
Charlotte	Canadian	Canada	Financial harm including, by paying for NXIVM courses, programs and groups and EMs; uncompensated labor including facilitating intensives, coaching students, administrative work and recruiting new students for NXIVM without compensation in reliance on the promise that if she met the hours per week and recruiting requirements she would earn the equivalent of a salary from commissions and income from companies under the NXIVM umbrella, unpaid work for DOS as a slave, termination by her employer as a result of her involvement in DOS and lost employment opportunities. Emotional harm including pain and suffering for trauma associated with the possible public dissemination of collateral.
Chapman, Tabitha	U.S.A.	California	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups
Christiansen, Rod	Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups and EMs, and uncompensated labor including coaching intensives, coaching students and attending meetings.
Constantino, Isabella	U.S.A	New York	Financial harm including, by paying for NXIVM curriculum and uncompensated labor, including participating in the fright studies and lost employment opportunities. Emotional harm including pain and suffering incidental to participating in

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			NXIVM's human experimentation "studies".
Cottrell, Caryssa	U.S.A.	Wisconsin	Financial harm including, by paying for NXIVM curriculum and uncompensated labor, including participating in the fright studies and lost employment opportunities. Emotional harm including pain and suffering incidental to participating in NXIVM's human experimentation "studies".
Cooley, Pamela	Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups, EMs, and travel and boarding expenses for courses and programs, and uncompensated labor including coaching intensives, coaching students and attending meetings and event planning.
Cua, Rosalyn	Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups, EMs, and travel and boarding expenses for courses and programs, and uncompensated labor including coaching intensives, coaching students and attending meetings and administrative work.
Daniela	Mexico	Mexico	Physical harm including injuries caused by sexual activity with Raniere. Financial harm including, expenses for return travel from Mexico to Albany, uncompensated labor including IT, administrative work, preparing extensive reports for Raniere, conducting research for Raniere, developing key loggers, writing letters to Raniere and sexual labor, and lost education and employment opportunities while she worked for Raniere and when she returned to Mexico and was unable to seek employment due to not having her identification. Emotional harm including from terminating unwanted pregnancies

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			and being isolated and shunned by her family and threatened with deportation.
Edmondson, Sarah	Canadian	Georgia	Financial harm including, by paying for NXIVM curriculum and EMP training; and attorney's fees for representation and PR costs in connection with a complaint filed with the Vancouver police department by Clare Bronfman; uncompensated labor, including facilitating intensives, coaching students, administrative work and recruiting new students for NXIVM without compensation in reliance on the promise that if she met the hours per week and recruiting requirements she would earn the equivalent of a salary from commissions and income from companies under the NXIVM umbrella; unpaid work for DOS as a slave; lost employment opportunities;. Emotional harm including pain and suffering for trauma associated with the public dissemination of collateral, being branded, and being threatened with criminal prosecution.
Fair-Layman, Stephanie	USA	New York	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups, EMs, and travel and boarding expenses for courses and programs and uncompensated labor coaching intensives, coaching students and attending meetings
Fiander, Brianna	Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups, EMs, and travel and boarding expenses for courses and programs and uncompensated labor coaching intensives, coaching students and attending meetings.
Gendron, Gabrielle	Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups and travel

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			and boarding expenses for courses and programs.
Giroux, Owen	Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups
Golfman, Jeffrey	Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups, EMs, and travel and boarding expenses for courses and programs and uncompensated labor including coaching intensives, coaching students and attending meetings.
Gray, Robert	Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups, EMs, and travel and boarding expenses for courses and programs and uncompensated labor including coaching intensives, coaching students and attending meetings.
Green, Polly	Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups.
Grosse, Kayla	U.S.A.	California	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups and uncompensated labor including coaching intensives, coaching students and attending meetings
Hammond, Andrea	U.S.A.	New York	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups EMs, travel and boarding expenses for courses and programs
Harvey, Ashley	Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups, EMs, travel and boarding expenses for courses and programs and uncompensated labor

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			including coaching intensives, coaching students, administrative work, cleaning and food preparation.
Haynes, Rees Alan	Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups
Holmes, Shayna	Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups, EMs, travel and boarding expenses for courses and programs and uncompensated labor including coaching intensives, coaching students and attending meetings.
Huang, Yan	Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups, travel and boarding expenses for courses and programs and uncompensated labor including sales.
Hubbard, Tanya	Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups, travel and boarding expenses for courses and programs.
Doe 8, Jane	Canadian	Canada	Financial harm including, by paying for NXIVM curriculum, uncompensated labor including facilitating intensives, coaching students, administrative work and recruiting new students for NXIVM without compensation in reliance on the promise that if she met the hours per week and recruiting requirements she would earn the equivalent of a salary from commissions and income from companies under the NXIVM umbrella, unpaid work for DOS as a slave, and lost employment opportunities. Emotional harm including pain and suffering for trauma associated

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			with the possible public dissemination of collateral.
Doe 9, Jane	Canadian	Canada	Financial harm including, by paying for NXIVM curriculum, uncompensated labor including facilitating intensives, coaching students, administrative work and recruiting new students for NXIVM without compensation in reliance on the promise that if she met the hours per week and recruiting requirements she would earn the equivalent of a salary from commissions and income from companies under the NXIVM umbrella, unpaid work for DOS as a slave, and lost employment opportunities. Emotional harm including pain and suffering for trauma associated with the possible public dissemination of collateral.
Jaspeado, Veronica	Mexican	Mexico	Physical harm including injuries caused by sexual activity with Raniere. Financial harm including, by paying for NXIVM curriculum, uncompensated labor including facilitating intensives, coaching students, administrative work and recruiting new students for NXIVM without compensation in reliance on the promise that if she met the hours per week and recruiting requirements she would earn the equivalent of a salary from commissions and income from companies under the NXIVM umbrella; sexual labor, unpaid work for DOS as a slave, and lost employment opportunities. Emotional harm including pain and suffering for trauma associated with the possible public dissemination of collateral, and being branded.
Kobelt, Jennifer	Canadian	Canada	Financial harm including, by paying for NXIVM curriculum and uncompensated labor, including participating in the fright studies and lost employment opportunities. Emotional harm including pain and



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			suffering incidental to participating in NXIVM's human experimentation "studies" and being threatened with criminal prosecution.
Kozak, Ken	U.S.A.	New York	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups and uncompensated labor including audio/video filming and editing, audio and video technician work, legal research/support, website development, graphic design, computer support, contract service- transportation, administrative work, transcription and demolition work/garbage removal.
Kristin	U.S.A	California	Financial harm including, by paying for NXIVM curriculum, uncompensated labor including facilitating intensives, coaching students, administrative work and recruiting new students for NXIVM without compensation in reliance on the promise that if she met the hours per week and recruiting requirements she would earn the equivalent of a salary from commissions and income from companies under the NXIVM umbrella; unpaid work for DOS as a slave, and lost employment opportunities. Emotional harm including pain and suffering for trauma associated with the possible public dissemination of collateral.
Leviton, Margot	Canadian	Canada	Financial harm including, by paying for NXIVM curriculum and uncompensated labor, including participating in the fright studies and lost employment opportunities. Emotional harm including pain and suffering incidental to participating in NXIVM's human experimentation "studies".
Lim, Sara	U.S.A.	New York	Financial harm including, by paying tuition and membership fees for NXIVM

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			courses, programs and groups, travel and boarding expenses for courses and programs and uncompensated labor including coaching intensives, coaching students and attending meetings, news reporting and fitness training.
Livesy, Warne	Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups and uncompensated labor including coaching intensives, coaching students and attending meetings
MacInnis, Lindsay	Canadian	Canada	Financial harm including, by paying for NXIVM curriculum and uncompensated labor, including creating the curriculum for exo/eso and facilitating trainings, administrative work and recruiting new students for exo/eso without compensation in reliance on the promise that she would earn a percentage of revenue from exo/eso; and lost employment opportunities including from quitting her job to work for exo/eso full time. Emotional harm including pain and suffering for the medical conditions incidental to her work for exo/eso.
MacQuarrie, Nils	U.S.A.	California	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups, travel and boarding expenses for courses and programs and uncompensated labor including coaching intensives, coaching students and attending meetings, and operating video cameras.
Madani, Anthony	Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups, EMs, travel and boarding expenses for courses and programs and uncompensated labor including coaching intensives, coaching students and attending meetings and

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			administrative work, cleaning, operating video cameras and editing film.
McLean, Ashley	Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups, travel and boarding expenses for courses and programs and uncompensated labor including operating cameras, event planning, editing and news reporting.
Mehdaoui, Soukiana	U.S.A	New York	Physical harm including injuries caused by sexual activity with Raniere. Financial harm including, by paying for NXIVM curriculum; uncompensated labor including writing, producing, directing and editing video content; sexual labor; unpaid work for DOS as a slave; costs of relocating to Albany; costs of relocating when she went into hiding as a result of the threatening letter she received from Clare Bronfman's attorneys; and lost employment opportunities. Emotional harm including pain and suffering for trauma associated with the possible public dissemination of collateral and being threatened with litigation.
Menashy, Ariella	Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups, EMs, and travel and boarding expenses for courses and programs and uncompensated labor including coaching intensives, coaching students.
Menhaji, Elham	U.S.A.	New York	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups, travel and boarding expenses for courses and programs, and uncompensated labor including coaching intensives, coaching students and administrative work.

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Miljkovic, Maja	Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups; paying for the cost of her divorce following the sham marriage; and uncompensated labor including coaching intensives, coaching students, operating video cameras and editing video, and news reporting.
Natalie, Toni	U.S.A	New York	Financial injury, including attorney's fees and costs for defending herself against vexatious litigation and emotional injuries including pain and suffering from the stress of defending herself in litigation.
Neal, Michelle	Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups, EMs, travel and boarding expenses for courses and programs and uncompensated labor including coaching intensives, coaching students and attending meetings and administrative work, web development and news reporting.
Nicole	U.S.A	New York	Physical harm including injuries caused by sexual activity with Raniere and being branded. Financial harm including, by paying for NXIVM curriculum, uncompensated labor including as instructor for The Source and sexual labor, unpaid work for DOS as a slave, and lost employment opportunities. Emotional harm including pain and suffering for trauma associated with the possible public dissemination of collateral, being branded and being threatened with litigation.
Oxenberg, India	U.S.A	California	Physical harm including injuries caused by sexual activity with Raniere and being branded. Financial harm including, by paying for NXIVM curriculum, uncompensated labor including facilitating intensives, coaching students, administrative work and recruiting new

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			students for NXIVM without compensation in reliance on the promise that if she met the hours per week and recruiting requirements she would earn the equivalent of a salary from commissions and income from companies under the NXIVM umbrella and sexual labor, unpaid work for DOS as a slave, and lost employment opportunities. Emotional harm including pain and suffering for trauma associated with the possible public dissemination of collateral and being branded.
Pena, Paloma	Mexican	Mexico	Physical injuries because of being branded. Financial harm including, by paying for NXIVM curriculum, uncompensated labor including facilitating intensives, coaching students, administrative work and recruiting new students for NXIVM without compensation in reliance on the promise that if she met the hours per week and recruiting requirements she would earn the equivalent of a salary from commissions and income from companies under the NXIVM umbrella; unpaid work for DOS as a slave, and lost employment opportunities. Emotional harm including pain and suffering for trauma associated with the possible public dissemination of collateral, and being branded.
Piese, Bonnie	U.S.A	California	Financial harm including, by paying for NXIVM curriculum and uncompensated labor, including creating the curriculum for exo/eso and facilitating trainings, administrative work and recruiting new students for exo/eso without compensation in reliance on the promise that she would earn a percentage of revenue from exo/eso; and lost employment opportunities including from quitting her job to work for exo/eso full time. Emotional harm including pain and

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			suffering for the medical conditions incidental to her work for exo/eso.
Pratt, Susan	Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups.
Rachel	U.S.A.	California	Financial harm including, by paying for NXIVM curriculum, uncompensated labor including facilitating intensives, coaching students, administrative work and recruiting new students for NXIVM without compensation in reliance on the promise that if she met the hours per week and recruiting requirements she would earn the equivalent of a salary from commissions and income from companies under the NXIVM umbrella, unpaid work for DOS as a slave, and lost employment opportunities. Emotional harm including pain and suffering for trauma associated with the possible public dissemination of collateral.
Rood, Alison	U.S.A.	California	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups, travel and boarding expenses for courses and programs and uncompensated labor including coaching intensives, coaching students and attending meetings and administrative work.
Salazar, Jessica Joan	U.S.A	California	Financial harm including, by paying for NXIVM curriculum, relocating to Albany, uncompensated labor, including for the t-shirt business, as instructor for The Source costs of relocating when she went into hiding as a result of the threatening letter she received from Clare Bronfman's attorneys; and lost employment opportunities as a result of moving to Albany. Emotional harm including pain and suffering for trauma associated with the possible public dissemination of

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			collateral, and being threatened with criminal prosecution.
Stiles, Adrienne	U.S.A	New York	Financial harm including, by paying for NXIVM curriculum and uncompensated labor, including creating the curriculum for exo/eso and facilitating trainings, administrative work and recruiting new students for exo/eso without compensation in reliance on the promise that she would earn a percentage of revenue from exo/eso; and lost employment opportunities including from quitting her job to work for exo/eso full time. Emotional harm including pain and suffering for the medical conditions incidental to her work for exo/eso.
Shaw, Katie	U.S.A.	West Virginia	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups, travel and boarding expenses for courses and programs.
Starr, Scott	U.S.A.	North Carolina	Financial harm including, by paying for NXIVM curriculum and training, uncompensated labor, including facilitating intensives, coaching students, administrative work and recruiting new students for NXIVM without compensation in reliance on the promise that if he met the hours per week and recruiting requirements, he would earn the equivalent of a salary from commissions and income from companies under the NXIVM umbrella, lost employment opportunities, and also defrauded by paying for his child to receive an education at RCG.
Valerie	U.S.A	California	Financial harm including, by paying for NXIVM curriculum; travel and boarding expenses for courses and programs; uncompensated labor including administrative work and recruiting new

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			students for NXIVM without compensation including unpaid work for DOS as a slave, and lost employment opportunities. Emotional harm including pain and suffering for trauma associated with the possible public dissemination of collateral.
Vanderheyden, Hannah	Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups and uncompensated labor including coaching intensives, coaching students and attending meetings.
Vicente, Juliana	U.S.A.	California	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups and uncompensated labor including bookkeeping.
Vicente, Mark	U.S.A	California	Financial harm including, by paying for NXIVM curriculum and EMP training, uncompensated labor, including facilitating intensives, coaching students, administrative work and recruiting new students for NXIVM without compensation in reliance on the promise that if he met the hours per week and recruiting requirements, he would earn the equivalent of a salary from commissions and income from companies under the NXIVM umbrella and lost employment opportunities.
Vieta, Susan Patricia	Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups, and travel and boarding expenses for courses and programs.
Wall, Sarah	U.S. and Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups travel and boarding expenses for courses and



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			programs and uncompensated labor including coaching intensives, coaching students and attending meetings
Williams, Chad	Canadian	Canada	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups, travel and boarding expenses for courses and programs and uncompensated labor including coaching intensives, coaching students and attending meetings and administrative work.
Wysocki, Susan	U.S.A.	Massachusetts	Financial harm including, by paying tuition and membership fees for NXIVM courses, programs and groups.